

To: Raps, Virginia[raps.virginia@epa.gov]
From: Russ, Timothy
Sent: Mon 1/30/2017 9:56:15 PM
Subject: FW: General Conformity - R8 Wyoming Drilling Project
[NPL General Conformity 4-16-13.docx](#)
[BLM Responses to Region8 on Draft PTC-List EPA Comments Dated 2-9-2015.docx](#)
[Drill Rig Petition EPA 2009 Response Dated 6-2-2009.pdf](#)
[Region8 Comments on BLM Draft Exemption List Dated 6-11-2013.docx](#)
[Region8 Comments on BLM Draft PTC-List Dated 6-11-2014.docx](#)
[WDEQ 2008 Interim Policy UGRB.pdf](#)
[WDEQ Permit MD-16984 Well Completion.pdf](#)
[WDEQ Permit MD-16985 Well Blowdown-Venting.pdf](#)
[WDEQ Permit P0020602 Drill Rig Fleet.pdf](#)
[WAQSR Chapter6 Permitting Regulations.pdf](#)
[WAQSR Chapter8 See Section3 for General Conformity.pdf](#)

Hi Virginia,

Glad we could catch up on the phone today to get acquainted!

Scott Jackson provided you the first item (highlighted in green) listed below and to keep everything together, I've reattached that document.

I've also provided the following items for your review:

- From the list farther below (highlighted in yellow): *Regional comment letters R8 provided on the BLM Draft Presumed to Conform (PTC) list and, EPA's 2009 response to a citizen petition regarding drill rig emissions in Colorado.*
- Pertinent materials relating to BLM's Exempt List, PTC list dated 10/1/14 along with BLM's 2/9/15 responses. The BLM's 2/9/15 responses provide insight as to how BLM considers exemptions for general conformity from the use of WDEQ permits.
- Three sample Wyoming DEQ (WDEQ) permits: P0020602 (Drill Rig Fleet), MD-16985 (Well Blowdown and Venting), and MD-16984 (Well Completion)
- WDEQ's "2008 Interim Policy" for permits in Wyoming's Upper Green River Basin (UGRB) 2008 8-hour NAAQS ozone nonattainment area. Permits issued by WDEQ for use in the UGRB must also comply with the provisions of this Policy.

For your reference, I've also attached Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6 (see Section 2) for air permits and WAQSR Chapter 8 (see Section 3) for the State's General Conformity provisions. Sorry, the way Wyoming makes these regulations accessible doesn't allow a ready weblink – so I provided the downloaded versions.

Lot of material here; please let me know if you have any questions. Again, much appreciate your Assistance Virginia!

Tim

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From: Jackson, Scott
Sent: Friday, January 27, 2017 2:58 PM
To: Raps, Virginia <raps.virginia@epa.gov>
Cc: Brachtl, Megan <Brachtl.Megan@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>; Russ, Timothy <Russ.Tim@epa.gov>
Subject: RE: General Conformity - R8 Wyoming Drilling Project

Virginia,

I'm glad you were able to review the document I sent. The comment letter referenced in your first bullet is attached. I'm copying Tim Russ (R8 gen. conf. staff lead) on this email so that he can compile the rest of what you are requesting and send them to you. He is on annual leave today but I expect he'll be able to get you everything on Monday.

Have a good weekend,

Scott

Scott Jackson, Unit Chief

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From: Raps, Virginia

Sent: Friday, January 27, 2017 2:48 PM

To: Jackson, Scott <Jackson.Scott@epa.gov>

Cc: Brachtl, Megan <Brachtl.Megan@epa.gov>; Mathias, Scott <Mathias.Scott@epa.gov>

Subject: General Conformity - R8 Wyoming Drilling Project

Hello Scott – It was very interesting talking to you yesterday about the Wyoming drilling project. We have read the “Issue Paper” you sent to us and believe we could be more responsive to your questions if we could review the comments sent/received pertaining to Option 1:

- Regional comment letters R8 provided on the Preliminary DEIS for the NPL;
- Regional comment letters R8 provided on the BLM Draft Presumed to Conform (PTC) list; and
- EPA’s 2009 response to a citizen petition regarding drill rig emissions in Colorado.

Would you be able to email these documents to us? We would like to take a quick look at them.



Virginia L. Raps | EPA

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